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9/14/2012

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE LINKEDIN USER PRIVACY
LITIGATION

Case No. 12-CV-3088 EJD

**STIPULATION SETTING DATE TO
RESPOND TO CONSOLIDATED AMENDED
CLASS ACTION COMPLAINT**

Courtroom: 4, 5th Floor
Judge: Hon. Edward J. Davila
Trial Date: None Set

1 This Stipulation is entered into by and among plaintiffs Katie Szpyrka, Candyce Paraggua,
 2 Scott Shepherd, and Sam Veith (collectively “Plaintiffs”) and Defendant LinkedIn Corporation
 3 (“LinkedIn”) (Plaintiffs and LinkedIn collectively the “Parties”), by and through their respective
 4 counsel.

5 WHEREAS in *Szpyrka v. LinkedIn Corp.*, Case No. 12-CV-3088 EJD, which is the first-
 6 filed action and lead case, plaintiff Szpyrka filed a Complaint in the United States District Court
 7 for the Northern District of California on June 15, 2012;

8 WHEREAS a Waiver of the Service of Summons form in the *Szpyrka* action, executed by
 9 LinkedIn’s counsel, has been filed;

10 WHEREAS the previous deadline for LinkedIn to answer, move, or otherwise respond to
 11 the Complaint in the *Szpyrka* action was August 14, 2012 (60 days from the date on which
 12 plaintiff Szpyrka sent the request for waiver of service to LinkedIn);

13 WHEREAS a Case Management Conference in the *Szpyrka* action was scheduled to occur
 14 on August 31, 2012 (Dkt. No. 36);

15 WHEREAS plaintiff Szpyrka and LinkedIn filed a Stipulation to Extend Time to Respond
 16 to Complaint on August 13, 2012 (Dkt. No. 35) pursuant to which LinkedIn’s deadline to answer,
 17 move, or otherwise respond to the Complaint in the *Szpyrka* action was extended to 45 days after
 18 the date of the initial Case Management Conference in the *Szpyrka* action;

19 WHEREAS the Plaintiffs in four related actions in this district (*Szpyrka v. LinkedIn Corp.*;
 20 *Shepherd v. LinkedIn Corp.*; *Paraggua v. LinkedIn Corp.*; and *Veith v. LinkedIn Corp.*) jointly
 21 filed a Motion to Consolidate and Motion to Appoint Interim Lead Class Counsel and Liaison
 22 Class Counsel on July 16, 2012 (“Motion to Consolidate”), seeking, among other things, to (1)
 23 consolidate the four actions for all purposes; and (2) grant plaintiffs leave to file a consolidated
 24 amended complaint (Dkt. No. 12);

25 WHEREAS this Court issued an Order dated August 29, 2012 (Dkt. No. 40) that vacated
 26 the Case Management Conference that was previously set for August 31, 2012, and, among other
 27 things, (1) granted Plaintiffs’ Motion to Consolidate the four related actions in this district,
 28

(2) designated the *Szpyrka* action as the lead action, and (3) ordered the filing of a consolidated amended class action complaint on or before September 19, 2012;

WHEREAS the Parties have agreed that LinkedIn's deadline to answer, move, or otherwise respond to the consolidated amended class action complaint will be 45 days after Plaintiffs' deadline to file their consolidated amended class action complaint;

WHEREAS under Civil Local Rule 6-1(a), parties may stipulate in writing, without a court order, to extend the time within which to answer or otherwise respond to a complaint;

WHEREAS this stipulation will not alter the date of any event or deadline already fixed by court order;

NOW, THEREFORE, the Parties hereby stipulate and agree as follows:

LinkedIn's deadline to answer, move, or otherwise respond to the consolidated amended class action complaint in this action will be November 5, 2012 (which is 45 days after the deadline for Plaintiffs to file their consolidated amended class action complaint, extended to the next court day).

IT IS SO STIPULATED.

Dated: September 13, 2012

COOLEY LLP

By: /s/ Matthew D. Brown
Matthew D. Brown (196972)

Attorneys for Defendant LINKEDIN CORP.

Dated: September 13, 2012

EDELSON MCGUIRE LLC

By: /s/ Ari J. Scharg
Ari J. Scharg

Attorneys for Plaintiffs

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

Pursuant to Civil Local Rule 5-1(i)(3), I, Matthew D. Brown, attest that concurrence in the filing of this document has been obtained from each of the other signatories.

Dated: September 13, 2012

/s/ Matthew D. Brown

Matthew D. Brown

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